

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHANA FREIDMAN-KATZ,

Plaintiff,

ANSWER

10 CV 4708

-against-

PROFESSIONAL RECOVERY SERVICES, INC.,

Defendant(s).

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Defendant, PROFESSIONAL RECOVERY SERVICES, INC., by its attorney MEL S. HARRIS AND ASSOCIATES, LLC, answers plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt Collection Practices Act, but denies any violation thereof.

2. Defendant admits the allegations contained in paragraph "2" of the complaint.

3. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "3" of the complaint.

4. Defendant admits the allegations contained in paragraph "4" of the complaint.

5. Defendant admits the allegations contained in paragraph "5" of the complaint.

6. Defendant admits that it has contacted plaintiff for the purpose of collecting a debt.

7. Defendant denies each and every allegation contained in paragraph "7" of the complaint.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. Defendant denies each and every allegations contained in paragraph "9" of the complaint.

10. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "10" of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

10. Plaintiff's complaint fails to state a cause of action.

WHEREFORE, Defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
September 13, 2010



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